

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

JAWBONE INNOVATIONS, LLC,	§	Case No. 2:21-cv-00186-JRG
	§	
Plaintiff,	§	
	§	
v.	§	
	§	
SAMSUNG ELECTRONICS CO. LTD. and	§	
SAMSUNG ELECTRONICS AMERICA,	§	
INC.,	§	
	§	
Defendants.	§	
	§	

JURY TRIAL DEMANDED

JOINT MOTION TO STAY ALL DEADLINES AND NOTICE OF SETTLEMENT

Plaintiff Jawbone Innovations, LLC (“Jawbone”) and Defendants Samsung Electronics Co., Ltd. and Samsung Electronics America, Inc. (“Samsung”) (collectively, the “Parties”) hereby file this Joint Motion to Stay All Deadlines and Notice of Settlement.

All matters in controversy between the Parties have been settled in principle. The Parties respectfully request a stay of all case deadlines for thirty (30) days while the Parties finalize a settlement agreement and file dismissal documents with the Court.

WHEREFORE, the Parties respectfully request that the Court enter the proposed order submitted with this motion as set forth above.

Dated: November 28, 2022

Respectfully submitted,

/s/ Peter Lambrianakos

Alfred R. Fabricant

NY Bar No. 2219392

Email: ffabricant@fabricantllp.com

Peter Lambrianakos

NY Bar No. 2894392

Email: plambrianakos@fabricantllp.com

Vincent J. Rubino, III

NY Bar No. 4557435

Email: vrubino@fabricantllp.com

FABRICANT LLP

411 Theodore Fremd Avenue,
Suite 206 South
Rye, New York 10580
Telephone: (212) 257-5797
Facsimile: (212) 257-5796

Samuel F. Baxter

State Bar No. 01938000

Email: sbaxter@mckoolsmith.com

Jennifer L. Truelove

State Bar No. 24012906

Email: jtruelove@mckoolsmith.com

MCKOOL SMITH, P.C.

104 East Houston Street, Suite 300
Marshall, Texas 75670
Telephone: (903) 923-9000
Facsimile: (903) 923-9099

***ATTORNEYS FOR PLAINTIFF
JAWBONE INNOVATIONS, LLC***

/s/ Jin-Suk Park (with permission)

Jin-Suk Park

Email: jin.park@arnoldporter.com

Paul Margulies

Email: paul.margulies@arnoldporter.com

ARNOLD & PORTER KAYE SCHOLER LLP

601 Massachusetts Ave., NW
Washington, DC 20001-3743
Telephone: (202) 942-5000
Facsimile: (202) 942-5555

E Patrick C. Reidy

Email: patrick.reidy@arnoldporter.com

ARNOLD & PORTER KAYE SCHOLER LLP

70 West Madison Street, Suite 4200
Chicago, IL 60602
Telephone: (312) 583-2424
Facsimile: (312) 583-2360

Ryan M. Nishimoto

Email: ryan.nishimoto@arnoldporter.com

ARNOLD & PORTER KAYE SCHOLER LLP

777 South Figueroa Street, 44th Floor

Los Angeles, CA 90017

Telephone: (213) 243-4000

Facsimile: (213) 243-4199

Melissa R. Smith

Email: melissa@gillamsmithlaw.com

GILLAM & SMITH LLP

303 South Washington Avenue

Marshall, TX 75670

Telephone: (903) 934-8450

Facsimile: (903) 934-9257

***ATTORNEYS FOR DEFENDANTS SAMSUNG
ELECS. CO., LTD. AND SAMSUNG ELECS.
AMERICA, INC.***

CERTIFICATE OF SERVICE

The undersigned hereby certifies that on November 28, 2022, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system per Local Rule CV-5(a)(3).

/s/ Peter Lambrianakos
Peter Lambrianakos

CERTIFICATE OF CONFERENCE

The undersigned hereby certifies that Counsel for Plaintiff and Counsel for Defendant met and conferred per Local Rule CV-7(h) and that this joint motion is unopposed.

/s/ Peter Lambrianakos
Peter Lambrianakos